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*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**[CORRECTED]**

**DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBIT 1 TO THE  
DECLARATION OF HONG-AN VU IN  
SUPPORT OF ITS REPLY IN SUPPORT  
OF MOTION TO ENFORCE THE  
COURT'S JUNE 7, 2017 ORDER (DKT.  
563)**

Date: August 16, 2017

Time: 8:00 a.m.

Courtroom: 8, 19th Floor

Judge: Honorable William Alsup

Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of Hong-An Vu
2. [Proposed] Order
3. Unredacted Version of Ex. 1
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this corrected administrative motion for an order to file under seal Exhibit 1 to the Declaration of Hong-An Vu in Support of Defendant Otto Trucking’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563). On July 28, 2017, Otto Trucking filed an Administrative Motion to File Under Seal Exhibit 1 to the Declaration of Hong-An Vu in Support of Its Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563). (Dkt. No. 1040). This motion inadvertently omitted confidentiality designations for Otto Trucking and Defendants Uber Technologies, Inc. (“Uber”) and Ottomotto LLC (“Ottomotto”). Otto Trucking files this corrected motion to include those confidentiality designations.

Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal
Exhibit 1 to the Declaration of Hong-An Vu in Support of Defendant Otto Trucking’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563) (“Exhibit 1”)	Highlighted Portions (yellow highlighting designated by Otto Trucking; blue highlighting designated by Uber Technologies, Inc. and Ottomotto LLC; green highlighting designated by Waymo LLC)

The yellow-highlighted portions of Exhibit 1 contain highly confidential, sensitive business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate structure, and financial information. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. If this information were made public, Otto Trucking’s competitors and counterparties would have insight into how Otto Trucking structures its business agreements, allowing them to modify their own business strategy. Otto Trucking’s competitive standing could be significantly harmed.

Otto Trucking seeks to seal the blue-highlighted portions of Exhibit 1 because Uber and Ottomotto have designated the information in these portions as highly confidential. Otto Trucking does not oppose the merits of sealing the material designated by Uber and Ottomotto, and anticipates that Uber and Ottomotto will file declarations in accordance with Local Rule 79-5.

1 Otto Trucking seeks to seal the green-highlighted portions of Exhibit 1 because Plaintiff  
2 Waymo LLC (“Waymo”) has designated the information in these portions as “highly confidential”  
3 and “attorneys’ eyes only.” Otto Trucking does not oppose the merits of sealing the material  
4 designated by Waymo, and anticipates that Waymo will file declarations in accordance with Local  
5 Rule 79-5.

6 Otto Trucking’s request to seal is narrowly tailored to those portions of Exhibit 1 that merit  
7 sealing.

8  
9 Dated: August 1, 2017

Respectfully submitted,

10 By: /s/ Hong-An Vu

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18  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on August 1, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 1st day of August 2017 in Los Angeles, California.

/s/ Hong-An Vu  
Hong-An Vu